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Remarks

Claims 1-16 are currently pending in this case.

Claim 11 has been objected to because of informalities. The noted informalities have been addressed by the present amendments.

Claim 9 has been rejected as reciting non-statutory subject matter. Applicants have amended Claim 9 and believe that the amendments overcome the rejection.

Claims 1-2, 6-11 and 16 were rejected under 35 U.S.C. 102(b) as being anticipated by Blelloch et al. (USPN 5,768,594) (hereinafter Blelloch). The Blelloch patent shows how a program, possibly a sequential program, can be scheduled for distribution onto processing elements (Col. 2, lines 14-23). Under Blelloch, a scheduling manager manages the scheduling of tasks, which may be tasks of a parallel program.

Applicants respectfully assert that the manager of the Blelloch patent plays a different role from that of the sequential caller program of the present invention. Under Blelloch, the manager starts programs and checks their completion, for scheduling purposes only. In contrast, the sequential caller program of the present invention has a specific interface, or dedicated parallelization call, to each parallel program to be called. The invention provides a means for establishing such interfaces specific for each possible parallel function. Moreover, not only can the sequential caller program provide input in a format required by the parallel function (i.e., the dedicated parallelization call), but it can also accept the results of the parallel function as a basis for further computation (i.e., the parallel running, result gathering and deserialization of Claim 2 and means for returning results

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of Claim 16).

Applicants aver that all of the pending claims recite the dedicated parallelization call (Claims 1-11) and/or that the programming of the respective programs being independent in at least one of programming language, compilation, linkage and hardware platform (Claims 1-16), which is neither taught nor suggested by the Blelloch patent.

It is well established under U. S. Patent Law that, for a reference to anticipate claim language under 35 USC 102, that reference must teach each and every claim feature. Since the Blelloch patent does not teach steps or means for issuing a dedicated parallelization call from a sequential caller program, and does not teach or suggest independent programming in at least one of programming language, compilation, linkage and hardware platform, it cannot be maintained that Blelloch anticipates the invention as set forth in the independent claims, Claims 1, 9-12 and 16, or the claims which depend therefrom and add further limitations thereto.

Claims 3-5 and 12-15 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Blelloch in view of Goldberg (USPN 6,571,232) (hereinafter Goldberg). The Examiner has failed to recite any suggestion in the art for combining the Blelloch and Goldberg references. Applicants rely on the analysis of the Blelloch patent presented above and will not reiterate those arguments. With respect to the Goldberg patent, Applicants note that the Goldberg patent does not provide those teachings which are missing from the Blelloch patent. The Goldberg patent is cited for its teachings regarding code generation. Goldberg shows how code can be generated based on templates for the issuing of data base queries, but does not teach or suggest generating code to issue a call to a parallel method. Since neither reference teaches the claim features, a *prima facie* case of

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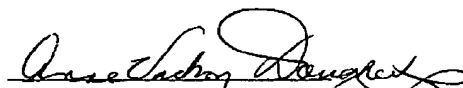
obviousness simply has not been presented by the Examiner  
(*In re Wilson*, 424 F.2d 1382, 165 USPQ 494 (C.C.P.A. 1970)).

In view of the above amendments and remarks,  
reconsideration of the application and allowance of claims  
are respectfully requested. If there are any issues  
remaining which the Examiner believes to be resolved through  
either a Supplemental Response, Affidavit or an Examiner's  
Amendment, the Examiner is respectfully requested to contact  
the undersigned attorney at the telephone number indicated  
below.

Please charge any fee necessary to enter this paper and  
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Respectfully submitted,

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